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5 **Attorneys for Plaintiff, NANCY BELLEVILLE**  
6

7 **UNITED STATES DISTRICT COURT**  
8 **CENTRAL DISTRICT OF CALIFORNIA**  
9

10 Nancy Belleville, an Individual

11 Plaintiff,

12 v.

13 PORSCHE CARS NORTH  
14 AMERICA, INC., a Delaware  
15 corporation, and DOES 1 through  
16 20, inclusive,

17 Defendants.  
18

19 Case No.: 2:25-cv-2631

20 [Los Angeles Superior Court Case No.  
25NWCV00618]

21 **NOTICE OF MOTION  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT OF  
PLAINTIFFS' MOTION FOR  
REMAND TO STATE COURT**

22 **DATE: May 29, 2025**

23 **TIME: 10:00 a.m.**

24 **COURTROOM: First Street  
Courthouse, Courtroom 5B**

25 **Action Filed: February 20, 2025**  
26 **Trial Date: None**

27 **TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF  
RECORD:**

28 **PLEASE TAKE NOTICE**, that on May 29, 2025, at **10:00 a.m.** or as soon  
29 thereafter as counsel may be heard the Hon. Hernán D. Vera in Courtroom 5B of the  
30 United States District Court, Central District Court, located at 350 W. 1st Street,

Courtroom 5B, 5th Floor, Los Angeles, California 90012, Plaintiff Nancy Belleville (“Plaintiff”) will and hereby does move the court for an order remanding this action to state court, specifically, the Los Angeles County Superior Court.

This Motion is made pursuant to 28 U.S.C. section 1447 because the removing party has the burden of proving that removal is proper both substantively and procedurally and, based upon the statements and evidence provided by Defendant PORSCHE CARS NORTH AMERICA, INC. (“Defendant”), it does not appear that Defendant can meet that burden.

This Motion is made following the conference of counsel pursuant to L.R. 7-3 which took place on April 10, 2025. The Parties disagreed on whether Defendant met its burden of proof that removal was procedurally and substantively proper. (See, Scott Decl. ¶ 5, Exhibit 1").

This Motion is based upon this Notice, the attached Memorandum of Points and Authorities, the attached Declaration of Caitlin J. Scott, all pleadings, records, documents, and papers on file herein, and upon such oral argument and documentary evidence as may be presented at the hearing of this Motion.

**AMERICAN LEMON LAW  
GROUP, LLP**

Dated: April 25, 2025

*/s/ Caitlin J. Scott*

Caitlin J. Scott, Esq.

Attorney for Plaintiff Nancy Belleville

**PLAINTIFF'S NOTICE OF MOTION AND MOTION FOR REMAND TO  
STATE COURT**